

Della Saunders
Preliminary Chemist--Cocaine

Background

- Name
- Employed
 - Where
 - How long
 - Current Position
 - Duties and responsibilities in that position
- Education
 - Where
 - Degrees

Training

- Training you received WRT to your current position as a chemist working for the DPH
 - 6 week training program
- How many chemists are employed at the lab
 - 15 cover the eastern half of the state
 - 3 cover the western half of the state
- Periodically training
 - Periodic testing as quality control check
- Have you had the opportunity to test substances to determine if they contain narcotics
 - How many times
- # of analyses you do per week
- Approximately how many cocaine samples have you tested during your career at the lab?

Expert Testimony

- Testified as in court regarding substances that you have analyzed in criminal cases?
 - # times
 - Courts

Test for cocaine

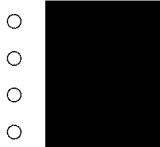
- Can you describe the test(s) to determine whether a substance contains cocaine
 - If cocaine is present what happens during that test (those tests)
 - Does this test have a name/do these tests have names

Lab Procedures

- Does your laboratory have protocols in place for receiving substances from police agencies for testing
- Can you explain in general how the lab receives substances from police agencies
- Once the substance(s) have been logged in how do they get assigned to a particular chemist for testing and analysis
- How do you receive case assignments for testing and analysis
- What happens when you are assigned a case
- How do you keep track of the cases you are assigned
- Did you have an opportunity to analyze some substances in this case

This case

- Did you receive some items for analysis in this case
- Did the laboratory assign analysis numbers to those items
 - When does that happen
- What type of substances were you assigned to test in this case
 - Clear bags containing white powder
- What were the analysis numbers that you were assigned to analyze



Testing

- Before you do any testing do you check to make sure your equipment is working properly
 - Describe
 - Check balances
 - Check reagents

[REDACTED]

- Can you tell us step by step what you did with those substances to analyze item [REDACTED]
 - 14 bags
 - Weighed all 14 bags
 - How
 - Weigh package with substance inside—Gross weight
 - Open package
 - Weigh empty package
 - Subtract to get the difference between gross weight and empty package—net weight
 - Weight
 - Each bag
 - 0.9088 grams
 - 1.02188 grams
 - 0.9924 grams

- 0.55448 grams
 - 0.9730 grams
 - 0.46810 grams
 - 0.4503 grams
 - 0.5375 grams
 - 0.4516 grams
 - 0.9241 grams
 - 0.5377 grams
 - 0.8402 grams
 - 0.5701 grams
 - 0.4538 grams
- Total 9.68 grams
- Testing
 - Preliminary color test
 - Blue for cocaine
 - Turned blue
 - Do it for each of the 14 bags?
 - Micro-crystalline test
 - Tests for naturally occurring cocaine v. synthetic cocaine
 - Naturally occurring cocaine
 - Never seen synthetic cocaine at lab
 - Do it for each of the 14 bags?
 - Put small amount in methanol
 - Dissolves
 - Do it for each of the 14 bags?
 - Put on a batch
 - Test runs overnight
 - Do it for each of the 14 bags?
 - Result—cocaine
 - For each of the 14 bags?
 - Give to Annie
 - Annie does confirmatory testing
 - Annie gives Della her results
 - Della puts the substance in a heat-sealed bag
 - Puts her initials on the bag
 - Analysis number on the bag
- Are the steps you just described the normal policies and procedures for testing an unknown substance
- Were you able to conclude to a reasonable degree of scientific certainty what substance was contained in item [REDACTED]
 - Cocaine
 - Mark as exhibit

Cert for [REDACTED]

- Did you generate a report that documented your observations and analysis
 - Approach

- Recognize
 - What
- How does this document get created?
 - Reflect that it is cocaine
 - Weight of the cocaine
- Is your signature on the document
- Does this document relate to these drugs
 - How do you know that these drugs relate to this drug certificate
 - Admit drug cert for [REDACTED]

After analysis

- Once you have completed your analysis of drug evidence what are the procedures at the state drug laboratory
- Give them to the confirmatory chemist
 - Annie Dookhan
- After her confirmatory testing is done, she returns them
 - Place them in heat sealed bag
 - Put initials on them
 - Put lab number on them
 - Dookhan signs the drug cert
 - Return the samples to person who did the intake on them at the lab
 - Police Department is contacted to pick up the items
- Were those procedures followed in this case

